

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Leila Green Little, et al.,

Plaintiffs,

v.

Llano County, et al.,

Defendants.

Case No. 1:22-cv-00424-RP

DECLARATION OF JONATHAN F. MITCHELL

1. My name is Jonathan F. Mitchell. I am over the age of 18 and fully competent in all respects to make this declaration.

2. I have personal knowledge of the facts stated in this declaration, and all of these facts are true and correct.

3. I represent the defendants in this litigation, and I submit this declaration in support of the defendants' response to the plaintiffs' motion to compel production of documents (ECF No. 130).

4. The plaintiffs want this Court to compel the disclosure of attorney-client communications because they claim that they want to discover the identity of the person who proposed the idea of donating the disputed books to the Llano Library's in-house checkout system. *See* Mot. to Compel, ECF No. 124, at 8–9.

5. None of the attorney-client communications that we have withheld on the ground of privilege disclose or reveal anything about the identity of the person who proposed the idea of donating the disputed books or their motivations for doing so.

6. I remain unable to recall who initiated or proposed the idea of donating the disputed books to the library's in-house checkout system, even after reviewing the

documents that we produced and the attorney-client communications that we withheld.

This concludes my sworn statement. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts stated in this declaration are true and correct.

Dated: March 29, 2023


JONATHAN F. MITCHELL